

Joseph P. Zammit

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Attorneys for Defendants

AT&T Inc., BellSouth Corporation,

AT&T Corp., SBC Long Distance, LLC

(incorrectly named herein as AT&T Long Distance, LLC),

AT&T Mobility Corporation, AT&T Mobility LLC,

New Cingular Wireless Services, Inc.,

Cingular Wireless II, LLC,

New Cingular Wireless PCS LLC,

BellSouth Mobility DCS, Inc.

and BellSouth Telecommunications, Inc.

- and -

Shawn Patrick Regan

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Attorneys for Defendant

BellSouth Long Distance, Inc.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AEROTEL, LTD., AEROTEL U.S.A., INC. and  
AEROTEL U.S.A., LLC,

Plaintiffs,

-v-

AT&T INC. (formerly SBC Communications, Inc.),  
BELLSOUTH CORPORATION, AT&T CORP., AT&T  
LONG DISTANCE, LLC (formerly SBC Long Distance,  
LLC), AT&T MOBILITY CORPORATION (formerly  
Cingular Wireless Corporation), AT&T MOBILITY LLC  
(formerly Cingular Wireless LLC), NEW CINGULAR  
WIRELESS SERVICES, INC. (formerly AT&T Wireless  
Services, Inc.), CINGULAR WIRELESS II, LLC (formerly  
Cingular Wireless II, Inc.), NEW CINGULAR WIRELESS  
PCS, LLC (formerly BellSouth Mobility, LLC),  
BELLSOUTH MOBILITY DCS, INC., BELLSOUTH  
TELECOMMUNICATIONS, INC., d/b/a AT&T  
SOUTHEAST, and BELLSOUTH LONG DISTANCE,  
INC. d/b/a AT&T LONG DISTANCE SERVICE,

Defendants.

FILED ELECTRONICALLY

Civil Action No.

07-Civ-3217 (RJH)

**NOTICE OF MOTION  
(1) OF DEFENDANTS AT&T  
INC. AND BELLSOUTH  
CORPORATION TO  
DISMISS THE COMPLAINT  
FOR LACK OF PERSONAL  
JURISDICTION; (2) OF ALL  
DEFENDANTS TO DISMISS  
THE AMENDED  
COMPLAINT FOR  
FAILURE TO STATE A  
CLAIM OR, IN THE  
ALTERNATIVE, FOR A  
MORE DEFINITIVE  
STATEMENT; AND (3) OF  
ALL DEFENDANTS TO  
DISMISS THE CLAIMS OF  
AEROTEL U.S.A., INC. AND  
AEROTEL U.S.A., LLC FOR  
LACK OF STANDING**

PLEASE TAKE NOTICE that upon the annexed declaration Edward P. Dolido, dated  
October 12, 2007, and the exhibits thereto including the declarations of Terrence Britt, dated

August 6, 2007; James W. Lacy, Jr., dated August 7, 2007; and Joseph P. Zammit, dated August 10, 2007, and upon the accompanying Memorandum of Law and all pleadings and proceedings heretofore had herein, Defendants, by their undersigned counsel, will move this Court before the Honorable Richard J. Holwell, U.S.D.J., in Courtroom 17B of the United States Courthouse, 500 Pearl Street, New York, NY, at a date and time to be designated by the Court, for an order: (1) dismissing the Amended Complaint as against AT&T Inc. and BellSouth Corporation, pursuant to Fed. R. Civ. P. 12(b)(2), on the ground that there is no personal jurisdiction over them since they are not present in, and do not conduct business in, New York; (2) dismissing the Amended Complaint as against all Defendants pursuant to Fed. R. Civ. P. 12(b)(6) or, in the alternative, granting a more definite statement pursuant to Fed. R. Civ. P. 12(e), on the ground that the Complaint does not identify any products or services alleged to infringe Plaintiffs' patent or identify what each Defendant is supposed to have done; (3) dismissing the claims of Aerotel U.S.A., Inc. and Aerotel U.S.A., LLC, pursuant to Fed. R. Civ. P. 12(b)(6), for lack of standing; and (4) granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the September 28, 2007, Order of the Court, opposition papers, if any, are to be filed on or before November 9, 2007, and reply papers, if any, are to be filed on or before November 16, 2007.

Dated: New York, New York  
October 12, 2007

**FULBRIGHT & JAWORSKI, L.L.P.**

By: /s/ Joseph P. Zammit  
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